

FILED
U.S. DISTRICT COURT
SAVANNAH, GEORGIA

2015 JAN 12 AM 9:46

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FORM TO BE USED BY PRISONERS IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. § 1983
in the UNITED STATES DISTRICT COURT for the SOUTHERN DISTRICT OF GEORGIA

Tracey L. Freeman # 754101

(Enter above full name of plaintiff or plaintiffs)

v.

Warden William Danforth (CDC)

CV 315 - 003

(Enter above full name of defendant or defendants)

I. Previous lawsuits.

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action? Yes _____ No X

If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county):

N/A

3. Docket number: _____

N/A

4. Name of judge assigned to case: _____

5. Disposition
(for example, was the case dismissed? appealed? is it still pending?):

N/A

6. Approximate date of filing lawsuit:

N/A

7. Approximate date of disposition:

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes _____ No ✓

- B. While incarcerated or detained in any facility, have you brought any lawsuits in federal court which deal with facts other than those involved in this action?

Yes _____ No X

If your answer to B is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to previous lawsuit:

Plaintiffs:

Defendants:

N/A

2. Court (name the district):

N/A

3. Docket number:

N/A

4. Name of judge assigned to case:

5. Disposition

(for example, was the case dismissed? appealed? is it still pending?):

N/A

6. Approximate date of filing lawsuit:

7. Approximate date of disposition: N/A

8. Were you allowed to proceed *in forma pauperis* (without prepayment of fees)? Yes _____ No X

C. As to any lawsuit filed in federal court where you were allowed to proceed *in forma pauperis*, was any suit dismissed on the ground that it was frivolous, malicious, or failed to state a claim? Yes _____ No X

1. If your answer to C is yes, name the court and docket number for each case:

N/A

II. Place of present confinement: Tehaia State Prison

A. Is there a prisoner grievance procedure in this institution? Yes X No _____

B. Did you present the facts relating to your complaint to the appropriate grievance committee? Yes X No _____

C. If your answer to B is yes:

1. What steps did you take? I wrote a statement and
I wrote a grievance.

2. What was the result? They rejected my grievance.

3. Did you appeal any adverse decision to the highest level possible in the administrative procedure? Yes x No

If yes, what was the result? They rejected it, due to attempt
to present multiple issues.

- D. If you did not utilize the prison grievance procedure, explain why not:

IV. Parties

(In Item A below, list your name as plaintiff and current address. Provide the name and address of any additional plaintiffs on an attached sheet.)

- A. Name of plaintiff: Tracey h. FREEMAN #764101
 Address: Telfair State Prison
P.O. Box 549
Helena, Ga 31039

(In Item B below, list the defendant's full name, position, place of employment, and current address. Provide the same information for any additional defendants in Item C below.)

- B. Name of defendant: Warden William Danforth (CDC)
 Position: WARDEN
 Place of employment: Telfair State Prison
 Current address: P.O. Box 549
Helena, Ga 31039

- C. Additional defendants: Dr. Stevens (Augusta State Medical Prison)
Warden Toby (WARDEN of Security)
LT. Beasley
Officer Poynts
Inmate Gordon Evans (Head-member)
Inmate Styles (gang-member)
Inmate Rachett (gang-member)

V. Statement of Claim

State here as briefly as possible the FACTS in your case. Describe how each defendant is personally involved in the depriving you of your rights. You must include relevant times, dates, places, and names of witnesses. DO NOT GIVE LEGAL ARGUMENTS OR CITE ANY CASES OR STATUTES. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 3-21-14, I Tracey L. FREEMAN WAS ASSUALTED, BEATEN AND STAMPED BY MEMBERS OF THE BLOOD-GANG. THE HEAD BLOOD MEMBER "INMATE GORDON EVANS", GAVE THE ORDER TO (5) FIVE OF HIS MEMBERS. INMATE RACHETT, INMATE STYLES, THE OTHER I KNEW BY NICK-NAMES. ON 3-21-14, AROUND 9:30AM THE WHOLE ADMINISTRATIVE STAFF AT TELFAR STATE PRISON CAME ACROSS SOME CELL-PHONE, TABACCO, AND METH THAT WAS HIDDEN IN A BLOOD-MEMBER CELL. AFTER CONFISCATING THESE ITEM, THE STAFF LEFT OUR BUILDING, SOON AFTERWARD THE HEAD BLOOD MEMBER "INMATE GORDON EVANS" WENT TO OFFICER POWERS AND TOLD HIM THAT THE SWITCH HAS TO PAY FOR HIS STUFF GETTING TOOK. SO A MEETING WAS CALLED FOR ALL THE BLOOD-MEMBERS WHEN THE MEETING WAS OVER THEY WENT DIFFERENT WAYS. I WAS STANDING AT THE FRONT-DOOR OF D-1 BUILDING, AND INMATE RACHETT CAME TO THE WATER FOUNTAIN AND ASKED ME COULD HE HOLLA AT ME. SO I WENT TOWARD MY CELL WHICH WAS ROOM "137" HE THEN SAID OVER HERE. SO I WENT TO ROOM "103", INMATE RACHETT GRABBED ME FROM BEHIND AND INMATE STYLES, AND THE OTHER MEMBERS STRATED BEATEN ME, AND I WAS HEADED TO MY CELL, WHEN A UNIDENTIFIED INMATE SAID, "THEY

just jumped and free-pick him because he's the only one that goes out the building and one of these officers that brings in contraband, told them to watch him because he's the snitch. Blood was everywhere. Inmate Styles and inmate Rachett told me if they ask me what happen to tell them that I had something that belong to the Blood-gang, and inmate Styles made a statement out loud saying you lucky we didn't kill you. I then told Inmate Styles and Rachett, you know I didn't snitch on y'all. I went to the hole for the Blood-gang when they caught them phones in the toilet. I stated I did hole time for the blood-gang and inmate Rachett, stated they let you out and didn't charge you either, and put you back in the same room with my Big Homie. So you could snitch someone to the people up front, and now this has happen. So get your Police ass out this damn. So I went to the front dude and told them I had to go. Officer Pounds told me that the Blood-gang told him that they was going to get the snitch. And he told me that the instuation had label me as a snitch. But he didn't think they was serious about beating me, That's why he didn't move me, or let his supervisor know what the blood-gangs said. He also stated that he didn't understand why they put me back in the same building and room, when they had me label as a snitch. I was beaten badly gang-members, they broke a bone behind my eye which Dr. Stevens the surgeon had to put a wall around my eye to support the bone. My nose was fractured, they had to reconstruct my nose, also my right shoulder is dislocated, the muscle are torn, I got to have surgery. Then Lt. Beasley and Ms. Tobo (warden of security) said they was sorry what

happen to me and they know it wasn't my fault, because the Administration staff done an element of surprise shake-down on D-1 building, and the gang members got the impression that I was the one informed them of the whereabouts of this stuff. Warden Williams Donforth deprived me reasonable safety, due to staff negligence I was assaulted and injured.

Tracy L. Freeman
Tracy, L. Freeman
758101

VI. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

I want to have Warden Danforth of ~~Texas~~ State Prison / Department of Correction held accountable for staff negligence, due to staff negligence I was assaulted and injured which caused physical and emotional harm. I instruct Warden Danforth / Department of Corrections to bring charges against these individuals that assaulted me. I am also asking the court that I be compensated for my injuries.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 5th day of January, 20 15.

Prisoner No. 734101

[Signature]
(Signature of Plaintiff)